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VIJAYANT PAWAR**

MEMO ENDORSED

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November 12, 2007

VIA FACSIMILE and FIRST CLASS MAIL

Honorable Deborah A. Batts
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/13/2007

**Re: COUNTErr TERRORIST GROUP US and J.K. IDEMA v.
ASSOCIATED PRESS, ET. AL.
Docket No. 07-Civ-6299 (DAB)**

Dear Judge Batts:

I serve as co-counsel to the Plaintiffs, Counterr Terrorist Group US and J.K. Idema in the above-referenced matter. After personally meeting with the plaintiff and agreeing to be involved in the case, I entered an appearance on October 17, 2007. A week later, on October 25, 2007, defendants filed a Motion to Dismiss plaintiffs' complaint, with plaintiffs' response due on November 13, 2007. I have not had the opportunity to review the volumes of documents that may or may not be pertinent to the filed motion. This letter serves as a request for a 60-day extension for plaintiffs to respond to the motion. The extension will allow me the opportunity to review the 33 page memorandum of law submitted by the defendants, as well as the 95 cases cited in the memorandum, communicate with the United States Copyright Office regarding filed registrations and obtain proof of same and prepare an adequate response to the motion to dismiss. The upcoming holiday season also serves as a basis for the request.

My co-counsel, John Edwards Tiffany, requested our adversary's consent to an extension. In response to our request, Gayle C. Sproul, counsel for AP, agreed to provide only a two-week extension. (See Exhibit A, Letter from Gayle Sproul to John Tiffany, Exhibit B, Letter from John Tiffany to Gayle Sproul).

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This is the first time plaintiffs have made such a request. Plaintiffs respectfully request that the Court grant a 60-day extension to file an opposition to defendants' motion to dismiss.

Thank you.

Respectfully Submitted,



Vijayant Pawar

cc: Gayle C. Sproul, Esq. (via facsimile and regular mail)
John E. Tiffany, Esq. (via electronic mail only)
Client
File

Plaintiffs are granted a two
week extension of their time
to file an opposition to
Defendants' Motion to Dismiss.

SO ORDERED



DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

11/13/2007

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